

GEORGE M. RANALLI, ESQ.
Nevada Bar No. 5748
BENJAMIN J. CARMAN, ESQ.
Nevada Bar No. 012565
RANALLI ZANIEL FOWLER & MORAN, LLP
2400 W. Horizon Ridge Parkway
Henderson, Nevada 89052
ranalliservice@ranallilawyers.com
Attorney for Defendant,
CSAA GENERAL INSURANCE COMPANY

UNITED STATES DISTRICT COURT

DISTRICT COURT OF NEVADA

JONI LeGALLEY, an individual,

2:17-CV-01232-JAD-VCF

Plaintiff,

V.

CSAA GENERAL INSURANCE COMPANY
a Foreign Entity aka AAA NEVADA
INSURANCE COMPANY aka AAA
INSURANCE; AMERICAN AUTOMOBILE
ASSOCIATION OF NORTHERN
CALIFORNIA, NEVADA & UTAH, aka
AAA NEVADA INSURANCE COMPANY
AAA INSURANCE; a Foreign
Entity; and ROES I through X.

Defendants.

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

(THIRD REQUEST)

IT IS HEREBY STIPULATED AND AGREED by Plaintiff, JONI LeGALLEY, and Defendant, CSAA GENERAL INSURANCE COMPANY a Foreign Entity aka AAA NEVADA INSURANCE COMPANY aka AAA INSURANCE, hereinafter CSAA GENERAL INSURANCE COMPANY to Extend Discovery Deadlines by sixty days.

1 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

- 2 1. Plaintiff's initial disclosures pursuant to FRCP 26;
- 3 2. Defendant American Automobile Association of Northern
- 4 California, Nevada & Utah disclosures pursuant to FRCP
- 5 26;
- 6 3. Defendant CSAA General Insurance Company a foreign entity
- 7 disclosures pursuant to FRCP 26;
- 8 4. Plaintiff's Request for Production of Documents to
- 9 American Automobile Association of Northern California,
- 10 Nevada & Utah;
- 11 5. Defendant American Automobile Association of Northern
- 12 California, Nevada & Utah Response to Plaintiff's Request
- 13 for Production of Documents;
- 14 6. Defendant American Automobile Association of Northern
- 15 California, Nevada & Utah First Supplemental Response to
- 16 Plaintiff's Request for Production of Documents;
- 17 7. Plaintiff's Request for Production of Documents to CSAA
- 18 General Insurance Company;
- 19 8. Defendant CSAA General Insurance Company Response to
- 20 Plaintiff's Request for Production of Documents;
- 21 9. Plaintiff's first supplemental disclosures pursuant to
- 22 FRCP 26;
- 23 10. Defendant CSAA General Insurance Company a foreign
- 24 entity first supplemental disclosures pursuant to FRCP
- 26;

11. Defendant CSAA General Insurance Company a foreign
- 2 entity second supplemental disclosures pursuant to FRCP
- 3 26;
- 4 12. Plaintiff's Responses to Defendant, CSAA's Request for
- 5 Admissions;
- 6 13. Plaintiff's Responses to Defendant, CSAA's
- 7 Interrogatories;
- 8 14. Plaintiff's Responses to Defendant, CSAA's Request for
- 9 Production of Documents;
- 10 15. Plaintiff's Expert Witness Disclosures;
- 11 16. Defendant's Designation of Expert Witnesses and
- 12 Documents;
- 13 17. Defendant's First Supplemental Designation of Expert
- 14 Witnesses and Documents;
- 15 18. Defendant CSAA General Insurance Company a foreign
- 16 entity third supplemental disclosures pursuant to FRCP
- 17 26;
- 18 19. Deposition of Joni LeGalley;
- 20 21. Deposition of Louis Mortillaro, PhD;
- 22 23. Deposition of Richard Cestkowski, D.O.;
- 24 25. Deposition of Ryan Grabow, M.D.;
26. Deposition of William Muir, M.D.;
- 27 28. Deposition of Brian Ogg;
- 29 30. Notice of Deposition of Brett Wolff;
- 31 32. Notice of Deposition of Person Most Knowledgeable of

1 CSAA;

2 27. Notice of Deposition of Heather Howell;

3 **B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE**
4 **COMPLETED:**

5 Plaintiff intends to take the deposition of at least two
6 additional adjusters, as well as the deposition of the personal
7 most knowledgeable of CSAA that is currently on calendar but
8 being moved due to a calendar conflict with Defense counsel and
9 CSAA. Defendant intends to depose Mr. Gellner. Both parties
10 intend to take additional expert witness depositions. Further,
11 after the depositions have been conducted, additional discovery
12 may need to be completed.

13 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED WITHIN**
14 **THE TIME LIMITS SET BY THE DISCOVERY ORDER.**

15 Both parties have been working diligently to complete
16 discovery in a timely manner. However, parties have been having
17 trouble getting dates that work with all parties and witnesses
schedules.

18 Further, Plaintiff's counsel was in and out of state for a
19 trial throughout February, March, and April. Scheduling witness
20 depositions has proved challenging, but the remaining
21 depositions have been put on calendar.

22 The parties believe that a sixty day extension will allow
23 both parties to complete all remaining depositions.

24 **D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:**

The parties have agreed to the following modified deadlines:

Discovery Cut off:	04/19/2018	06/18/2018
Expert Disclosure:	11/20/2017	CLOSED
Rebuttal of Experts:	12/20/2018	CLOSED
Interim Status Report:	11/20/2017	CLOSED
Dispositive Motions:	05/21/2018	06/20/2018
Pre Trial Order:	06/20/2018	07/20/2018

F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

Dated: April 18th, 2018 Dated: April 18th, 2018

RANALLI ZANIEL FOWLER & MORAN,
LLC

MINCIN LAW, PLLC

/s/ Benjamin Carman
GEORGE M. RANALLI, ESQ.
Nevada Bar No. 5748
BENJAMIN J. CARMAN, ESQ.
Nevada Bar No. 12565
2400 W. Horizon Ridge Parkway
Henderson, Nevada 89052
Attorneys for Defendant
CSAA GENERAL INSURANCE COMPANY

/s/ David Mincin
DAVID MINCIN, ESQ.
Nevada Bar No. 5427
CHRISTOPHER G. GELLNER, ESQ.
Nevada Bar No. 2556
7465 W. Lake Mead Boulevard,
#100
Las Vegas, Nevada 89128
Attorney for Plaintiff

ORDER

IT IS SO ORDERED:

Dated: April 19, 2018

Conrad